

# **EXHIBIT A**

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK

2023

Index No. 014025

SAMANTINA ZENON

Plaintiff,

-against-

GOOGLE, Inc. and  
RECKON MEDIA LLC,

Defendants,

SUMMONS

Plaintiff's Residence address:  
43-10 48<sup>th</sup> Ave. Apt.1F  
New York, New York 11377

The basis of the venue designated is:  
Both the defendant Google and the  
Plaintiff reside in New York, NY

Defendant Google Inc. located at 111 8<sup>th</sup> Avenue, New York, New York; and

Defendant Reckon Media LLC located at 1910 Pacific Ave., Suite #8025, Dallas, Texas

75201.

**YOU ARE HEREBY SUMMONED** to appear in the Civil Court of New York, County of New York, at the office of the Clerk of said Court at 111 Centre Street, New York and State of New York, within the time provided by law as noted below and to file your answer to the annexed complaint with the clerk; upon your failure to answer, judgment will be taken against you for the sum of \$\_\_\_ with interest thereon from the \_\_\_ day of \_\_\_, 2023, together with costs of this action. To the extent that you are served within 20 days after service of the Summons and Complaint, exclusive of the day of service, or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York.

Dated: Locust Valley, New York  
September 11, 2023,

Yours, etc.  
Constants Law Offices, LLC.

/s/ Alfred C. Constants III  
By: Alfred C. Constants III  
Attorneys for the Plaintiff  
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CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK

Index No. 014025

SAMANTINA ZENON

Plaintiff,

COMPLAINT

-against-

GOOGLE, Inc. and  
RECKON MEDIA LLC,

Defendants,

Plaintiff, Samantina Zenon, appearing herein by her attorney, Constants Law Offices, LLC, complaining of the defendants, Google, Inc. and Reckon Media, LLC. alleges as follows:

**THE PARTIES AND VENUE**

1. Plaintiff, Samantina Zenon (Ms. "Zenon"), is a resident of the State of New York and can be located at 43-10 48<sup>th</sup> Ave. Apt 1F, New York, New York 11377.
2. The defendant, Google Inc. ("Google"), is located at 111 8<sup>th</sup> Avenue, New York, New York.
3. The defendant, Reckon Media LLC ("Reckon") is located at 1910 Pacific Ave. Suite #8025, Dallas, Texas 75201.
4. The venue is based upon the residence of Ms. Zenon as well as the New York office of Google.

**THE FACTS**

5. Samantina Zenon is an actress, mental health advocate and public speaker.
6. In 2020, Ms. Zenon was working with a publicist that advised her to create a wikipedia page as she was a public figure.
7. Like many people, Ms. Zenon visited the number one search site GOOGLE to find a business to help with her request.

8. The first business that came up as a sponsored post (Paid Ad) was "Wiki Professional Inc," that means they are running the ad on the google platform which they set up with google ads.

9. Ms. Zenon filled out a form on wiki professional inc website, shortly after, she received an email from Peter Johnson on April 27, 2020.

10. Peter Johnson wanted to schedule a call with her.

11. During the call, Peter Johnson stated that he had connections with many top tier media outlets like Buzzfeed a source that has over 50 million users, and that he will have his writers submit these articles for Ms. Zenon to these media outlets, so that her application to Wikipedia would be approved.

12. A follow up email from Johnson stated: "Hi Samantina, It was a pleasure speaking to you over the phone! As discussed, for 15 articles it will be \$2250, you can pay \$1000 upfront and the remaining \$1250 by May 13<sup>th</sup>."

13. Mr. Johnson also informed Ms. Zenon that she must make a down payment of \$550 before he starts working on the articles.

14. Ms. Zenon made 3 payments to Johnson via PayPal for a total \$2800.

15. Mr. Johnson consistently led Ms. Zenon on as if he was working on the articles.

16. During the last week of December 2020, Mr. Johnson informed Ms. Zenon his work was done and the wikipedia was approved.

17. When Ms. Zenon went and checked it out with Wikipedia, she noticed that her application had been deleted.

18. Ms. Zenon also noticed many wikipedia pages that were being deleted were by the same user "AfDed."

19. Upon further investigation Ms. Zenon noticed this user has been posting wikipedia since 2010 and they all have been deleted.

20. It became obvious to Ms. Zenon that she may have been scammed.

21. Ms. Zenon reached out to Johnson about her concerns; Mr. Johnson proposed that she pays him more money to resubmit her application.

22. Mr. Johnson also advertised that you would receive the 100% money back guaranteed if the job was not fulfilled.

23. After, Ms. Zenon filed a complaint with PayPal, the finance institute that Mr. Johnson used to receive the payments.

24. Ms. Zenon received a message from Mr. Johnson that she had opened a dispute for \$2800 for the publications that his team did for her profile.

25. Mr. Johnson reply: "If you will close your case then we can refund you as the money is already taken out from our account. We are not playing any games but trying to get your page live."

26. Paypal confirmed no money was taking out of their account and Mr. Johnson was lying.

27. Mr. Johnson was basically telling Ms. Zenon to close the dispute so that he can continue to use to PayPal as a payment method to scam consumers.

28. Mr. Johnson stated that Ms. Zenon's profile was live on the improvement portal of Wikipedia that is Everipedia.

29. Mr. Johnson stated that if she did not want us to work on the project, kindly let us know so we can refund her for the profile, which he never did.

30. Mr. Johnson retracted and stated the articles that his team created were on Top-Tier source list but were not major publications as there was a difference between one major publication cost and a minimum \$3000.

31. Mr. Johnson stated he created 15 top-tier sources for her profile and that is the reason why her profile was submitted and was also made live.

32. However, Wikipedia was asking them to provide more coverage for her profile on major platforms and trying to get her page live without this requirement.

33. When Ms. Zenon realized she had been scammed, she reached out for help to Google right away about the matter and someone from her law enforcement team replied: "if you think that a crime has been committed, you may wish to contact law enforcement, and law enforcement can contact Google".

34. Ms. Zenon then replied: "It's more than that, it's about the fact that Google is allowing a fake company who is probably not based in America to use their platform to scam people. They even stole \$10K from one person, that's absolutely ridiculous!".

35. That was the end of that conversation between Ms. Zenon and Google.

36. No one from Google reached out to investigate further.

37. Ms. Zenon even called their customer service.

38. Ms. Zenon spoke to an unpleasant young lady who was only concerned about selling her ads.

39. Ms. Zenon tried expressing the matter to the agent so that Google would know that she had been scammed and to stop it from happening to others, The agent was not interested in hearing her concern and hang up on Ms. Zenon.

40. For the last few years Ms. Zenon periodically searches for "Wiki Professional Inc" on Google to see if Google was still allowing them to use their platform to continue to scam people.

41. And yes, Google continued to give them a platform.

42. Wiki Professional Inc even changed their locations multiple times.

43. Although there are hundreds of reviews online from victims like Ms. Zenon, Google continues to give them a platform to steal from consumers.

44. This incident ruined Ms. Zenon reputation and her character assassination.

45. Ms. Zenon's former Ballet teacher, Kat, former NYC Ballet dancer referred her to a real professional, a man named Keith that created Ms. Kat's wikipedia for her so Keith would assist Ms. Zenon with her wikipedia request.

46. Keith shortly informed Ms. Zenon, he will not be able to create a wikipedia page for her, because she has been flagged on the wikipedia platform as a potential scam, and she will need to wait a few years before making another attempt.

47. Ms. Zenon Wikipedia page has never been created.

48. Ms. Zenon's reputation has been ruined.

49. Ms. Zenon lost nearly \$3,000.

50. Ms. Zenon found out the real name of the company is -Reckon Media ("Reckon").

51. Reckon created multiple fake websites to scam people.

52. Reckon operated under Wiki professional inc, wiki management inc and wikipedia services.

53. Reckon used these companies to run ads on google to scam consumers.

54. Reckon advertises that it is a ghostwriting, editing and a publisher.

55. In particular in the advertisement, Reckon states that:

Every great advancement is born out of a fascinating work of imagination. We will take that step forward for you. Every story deserves to be told and heard. Therefore, we invite you to experience the work of industry's most professional yet extremely innovative ghostwriters under our one single platform.

56. Again in their website, Reckon states:

If you're hoping to hire a ghostwriter that will deliver your work to its fullest — we're the goal for you! We have a group of stars and amazing ghostwriters whose information, mastery and expertise reach out into different distinctive territories of writing. With the right ghostwriting experts that have involvement in many subjects and different line of work—your troubles become easier to handle.

57. From innovative app solutions to providing expert insights and experience across wide range of marketing channels, Reckon has the ability and experience to handle it all according to their statements.

58. Reckon put money in Google's pocket and used their platform to scam hard working consumers.

59. According to Wikipedia, Reckon Media LLC does not exist.

60. While Reckon may have a location on Texas, Reckon has had multiple locations.

61. Reckon was in New York City, also in California, and Texas.

62. Because of Google's participation in allowing Reckon to use the advertisement, Reckon can use its scammer to obtain money and not pay for the services.

### **Count I**

#### **Fraud by Reckon (or Wikipedia Professionals Inc.)**

63. Plaintiff repeats, reiterates and realleges each allegation set forth above as if set forth fully herein.

64. Reckon (and/ or "Wikipedia Professionals Inc.") committed a material misrepresentation or omission of fact to Ms. Zenon that they would provide ghost writing so that Ms. Zenon could become legal for the Wikipedia.



65. The Reckon statements were made by the defendant with knowledge of their falsity.

66. Reckon's plan was to defraud Ms. Zenon.

67. Ms. Zenon reasonably relied upon Reckon's misrepresentations, which resulted in damages to Ms. Zenon.

## **Count II**

### **Google's Aiding and Abetting Reckon**

68. Plaintiff repeats, reiterates and realleges each allegation set forth above as if set forth fully herein.

69. Google and its employees aided and abetted Reckon's conduct, who was conducting a scam and who paid Google for its use in advertising.

70. Google aided Reckon by providing support and assistance for Reckon's scamming.

71. Notwithstanding Ms. Zenon's complaints about Reckon, Google did nothing to prevent this scammer from taking place.

72. Upon information and belief, other people identified that Reckon as a scammer.

73. Nonetheless, Google did nothing to remove the scammer from its advertising.

74. Google only needs money despite the fact that Reckon was scamming its customers.

75. Google knew that to allow Reckon to advertise, would bring in additional victims of Reckon's scamming.

76. Ms. Zenon has been damaged by Google's conduct and she suffered money damages and her professional life has been ruined.

## **Count III**

### **Conspiracy between Google and Reckon**

77. Plaintiff repeats, reiterates and realleges each allegation set forth above as if set forth fully herein.

78. Google knew that to allow Reckon to advertise, would bring in additional victims of Reckon's scamming.

79. Google's agreement with Reckon provided support for what Reckon demanded.

80. Google's conspiracy with Reckon created damages to Ms. Zenon for money as well as her professional life was also damaged.

**WHEREFORE**, plaintiff demands judgment against Defendants in compensatory damages, punitive damages, that Google be prohibited from advertising Reckon Media LLC or any other entity that purports to be Reckon Media LLC., plus interest, costs disbursements, and attorneys' fees.

Dated: Locust Valley, New York

August 20, 2023

/s/ Alfred C. Constants III

By: Alfred C. Constants III  
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